

## **EXHIBIT 4**

Vijay Madisetti

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

MARSHALL DIVISION

TQ DELTA, LLC, Civil Action No.

Plaintiff, 2:21-cv-310

Vs.

COMMSCOPE HOLDING COMPANY, INC.

COMMSCOPE, INC., ARRIS

INTERNATIONAL LIMITED, ARRIS

GLOBAL LTD., ARRIS US HOLDINGS,

INC. ARRIS SOLUTIONS, INC.,

ARRIS TECHNOLOGY INC., and ARRIS

ENTERPRISES, LLC,

Defendants.

CONFIDENTIAL

Virtual Videotape Zoom Deposition of  
Vijay Madisetti

Thursday, December 1, 2022

At 9:00 a.m.

Reported by LeShaunda Cass-Byrd, CSR, RPR

JOB NO. 220196

Vijay Madisetti

APPEARANCES OF COUNSEL:

On behalf of CommScope Holding Company:

MICHAEL BITTNER, ESQ.  
JAMES LIN, ESQ.  
Winston & Strawn LLP  
255 Shoreline Drive  
Redwood City, California 94065

RACHEL WALSH, ESQ.  
Goodwin Procter LLP  
Three Embarcadero Center  
San Francisco, California 94111

On behalf of TQ Delta:

PETER MCANDREWS, ESQ.  
McAndrews, Held & Malloy, LTD  
500 West Madison Street  
Chicago, Illinois 60661

Also Present:

Kevin Marth, Videographer

Vijay Madisetti

## EXAMINATION OF VIJAY MADISETTI

By Ms. Walsh

7

## DEPOSITION EXHIBITS

EXHIBIT	DESCRIPTION	PAGE
---------	-------------	------

Exhibit 1	Expert Report on Vijay Madisetti, Ph.D. on Infringement of the Family 4 and Family 6 Patents	22
-----------	--	----

Exhibit 2	Errata to Expert Report of Vijay Madisetti, PhD, on Infringement of The Family 4 and 6 patents	27
-----------	--	----

Exhibit 3	Rebuttal Expert Report of Vijay Madisetti, PhD, on the Validity of The Asserted Claim of the Family 4 Patent (U.S. Patent Number 8,090,008	29
-----------	---	----

Exhibit 4	Document Bearing Bates number TQD-TX-00043899 through 43908	54
-----------	--	----

Exhibit 5	U.S. Patent Number 6,657,949 to Jones, et. al	134
-----------	--	-----

Exhibit 6	U.S. Patent 6,625,219 to Stopler	143
-----------	----------------------------------	-----

Exhibit 7	Rebuttal Expert Report of Vijay Madisetti, PhD, on validity of the Asserted claims of the Family 6 Patents (U.S. patent numbers 8,462,835; 8,594,162)	156
-----------	---	-----

Vijay Madisetti

Exhibit 8 U.S. Patent Number 8,462,835 164

Exhibit 9 Temporary Document SC-060, Bates  
Number CommScope 007290 through 7299 210

Exhibit 10 Expert Declaration of Vijay K  
Madisetti, PhD. 219

Exhibit 11 Decision Granting Institution of  
Inter Parties Review 226

Vijay Madisetti

THE VIDEOGRAPHER: Good morning, counselors. My name is Kevin Marth. I'm the legal videographer today in association with TSG Reporting, Inc.

Because this is a remote deposition, I will not be in the same room with the witness. Instead, I will record this videotaped deposition remotely.

Additionally, our court reporter today, Mrs. LeShaunda Byrd, also will not be in the same room and will swear the witness remotely.

Will parties stipulate to the validity of this remote swearing and the remote video recording and that it will be admissible in the courtroom as if it had been taken following Rule 30 of the Federal Rules of Civil Procedure and the states rules where this case is pending?

MS. WALSH: Yes, on behalf of defendants.

MR. MCANDREWS: Yes, on behalf of TQ Delta.

THE VIDEOGRAPHER: This marks the

Vijay Madisetti

start of media labeled 1, of the remote video-recorded deposition of Vijay Madisetti, in the matter TQ Delta, LLC, versus CommScope Holding Company, Inc., et al. before the United States District Court for the Eastern District of Texas, Marshall Division.

The remote video deposition today is being held on December 1, 2022, and the time on the video monitor is 9:09 a.m.

Again, my name is Kevin Marth. I'm the legal videographer in association with TSG Reporting, Inc. Our court reporter, Mrs. LeShaunda Byrd, also in association with TSG.

At this time, will counsel please state your appearances for the record, after which our court reporter will swear in the witness and we may proceed.

MS. WALSH: This is Rachel Walsh from Goodwin Procter in San Francisco on behalf of the CommScope defendants.

MR. MCANDREWS: This is Peter McAndrews from McAndrews, Held & Malloy on

1 Vijay Madisetti  
2 behalf of TQ Delta and the witness, Dr.  
3 Vijay Madisetti.

4 VIJAY MADISETTI,  
5 having been first duly sworn, was examined and  
6 testified as follows:

7 EXAMINATION

8 BY MS. WALSH:

9 Q. Good morning, Dr. Madisetti.

10 A. Good morning.

11 Q. As I sort of introduced myself a little bit  
12 earlier on the record, I'm counsel for CommScope in  
13 these matters, and I will be asking you some questions  
14 today.

15 Could you please state and spell your name  
16 for the record.

17 A. It's Vijay K. Madisetti, V-I-J-A-Y, K,  
18 M-A-D-I-S-E-T-T-I.

19 Q. Okay. And what is your address?

20 A. It's 56 Creekside Drive.

21 (Court Reporter Clarification.)

22 THE WITNESS: 56 Creekside Park  
23 Drive, Johns Creek, Georgia.

24 BY MS. WALSH:

25 Q. Where are you currently located?



Vijay Madisetti

you referring to with -- when you say a signal that has no information?

A. I meant that this did not have information with -- as in the court's construction.

Q. And the court's construction excluded having the FEC codeword counter value upon which the updated fix setting is to be used, correct?

A. Yes.

Q. Okay. And so the flag signal could have other information besides that, correct?

A. That is not -- that is not my understanding. It should not have my -- that is my opinion. My opinion is that it should not have the codeword counter value as described in the court's construction. I don't offer any hard word things as to what it may or may not have.

Q. So in paragraph 69, you go on and describe what I call an analogy to a white flag waived in battle and a white flag waved in a Nascar race.

Do you see that?

A. Yes.

Q. And so you go on to describe that, and you say, "The flag signal only indicates. It contains no information," correct?

Vijay Madisetti

REPORTER'S CERTIFICATE

I, LESHOUNDA CASS-BYRD, CSR No. B-2291, RPR,  
Registered Professional Reporter, certify that the  
foregoing proceedings were taken before me at the time  
and place therein set forth, at which time the witness  
was put under oath by me;

That the testimony of the witness, the questions  
propounded, and all objections and statements made at  
the time of the examination were recorded  
stenographically by me and were thereafter  
transcribed;

That the foregoing is a true and correct  
transcript of my shorthand notes to taken.

I further certify that I am not a relative or employee  
of any attorney or the parties, nor financially  
interested in the action.

I declare under penalty of perjury under the laws  
of North Carolina that the foregoing is true and  
correct.

Dated this December 9, 2022.

*Leshouna Byrd*

LESHAUNDA CASS-BYRD, CCR-B-2291, RPR